



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION III  
1650 Arch Street  
Philadelphia, Pennsylvania 19103-2029

Stacey L. Starkman, Director  
Merck West Point Safety & Environment  
770 Sumneytown Pike  
P.O. Box 4  
WP20-205  
West Point, PA 19486

JUL 22 2014

Dear Ms. Starkman:

This is in response to your January 17, 2014 letter requesting the U.S. Environmental Protection Agency's (EPA's) approval of performance test waiver requests and a proposed site specific monitoring plan under the federal plan for hospital/medical/infectious waste incineration (HMIWI) units.

Merck Sharp & Dohme Corp. (Merck) owns and operates two large HMIWI units at its West Point facility in Pennsylvania. The two HMIWI units are undergoing modifications in order to comply with the federal plan requirements in 40 CFR part 62, subpart HHH (federal plan, or subpart HHH) for existing HMIWI units applicable in Pennsylvania due to the absence of an EPA approved state plan implementing the 2009 emissions guidelines at 40 CFR part 60, subpart Ce. In order to comply with subpart HHH, Merck is proposing two different control scheme options for each unit: one while only natural gas is being fired and one during "normal" operation. The first control scheme proposed to comply with the emissions limits using the "combustion control only" requirements as described in subpart HHH. The second control scheme would use either a dry scrubber, fabric filter, wet scrubber combination, or a dry scrubber followed by a fabric filter, depending on the unit.

Merck is requesting waivers from performance tests required by the Performance Testing and Monitoring Requirements of subpart HHH. The federal plan requires that initial performance tests be performed to demonstrate compliance and to establish operating parameters. However, 40 CFR §60.8(b) allows the EPA to waive the requirement for performance tests if the owner or operator demonstrates by other means that the source is in compliance with the standard. Merck relied on AP-42 factors, operational data, and CEMS data to make this demonstration, and also proposed specific parameters to be monitored for periods where only natural gas is being fired. Merck did not request performance test waivers or request approval of site specific operating parameters for periods where waste is being charged to the unit(s).

EPA has determined that Merck has adequately demonstrated that the HMIWI units can comply with the emissions limits in subpart HHH when no waste is being charged to the chamber and while firing natural gas. Therefore, EPA approves Merck's request for waivers of stack test requirements during the "combustion control only" scenario outlined by Merck in its letter to EPA. EPA encourages



Merck to work with the Pennsylvania Department of Environmental Protection to ensure that operational scenarios where Merck is proposing to use the combustion control only option are adequately reflected in the title V operating permit.

If you have any additional questions, please contact Mr. Brian Rehn, at 215-814-2176, or Mr. Mike Gordon, at 215-814-2039.

Sincerely,

A handwritten signature in dark ink, appearing to read "Diana Esher". The signature is fluid and cursive, with the first name "Diana" written in a larger, more prominent script than the last name "Esher".

Diana Esher, Director  
Air Protection Division

